

8025 10th Avenue South

P.O. Box 81435

Seattle, WA 98108

Phone: 206/763-8050

Fax: 206/762-6444
Lic. No. LONGP-230MA

LDWSP
12.3.4/12.1
6-21-99



June 21, 1999

Robert Stone
Hazardous Waste Specialist
DEPARTMENT OF ECOLOGY
Northwest Regional Office
3190 160th Ave S.E.
Bellevue, Washington 98008-5452

Dear Mr. Stone:

Enclosed you will find the written certification of compliance. Also you will find analytical results of our paint booth filters designating them as hazardous waste. We will continue to test the filter media for the purpose of designating the waste as either hazardous or non-hazardous.

Please contact me if you should have any questions at (206) 763-8050 ext. 237.

Sincerely,
LONG PAINTING COMPANY

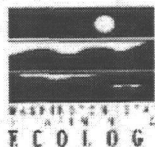
A handwritten signature in dark ink, appearing to read "John Carlson".

John Carlson
Safety Director

"YOUR PARTNER IN SAFETY, QUALITY AND SERVICE"



LP_02426



Inspection Date: 5/7/99

Dangerous Waste Compliance Checklist

TYPE OF VISIT: TECHNICAL ASSISTANCE COMPLIANCE INSPECTION COMPLAINT Other:

Opening Conference: Yes ☐ No ☐ Site Tour: Yes ☐ No ☐ Records Review: Yes ☐ No ☐ Closing Conference: Yes ☐ No ☐

Site

Site Name: Long Painting WAD 044036747
Site Contact(s): John Carlson Ushi Pomerleau Brian Vance
Title(s): Safety Director Asst Safety Director Facility Manager
Phone: 206/763-8050
Address: 8025 10th Ave S
Mailing Address: _____
City: Seattle Co: King Zip: 98101
Years on Site: 25 SIC# 1721
Generator/Facility Status (circle): SQG MQG **LQG** TSD Recycler Other _____
Type of Business: Structural painting as tanks, buildings, bridges, etc.

Ecology

Lead Contact: Bob Stone Phone: 425/649-7216 FAX 425/649-7098
Other Representatives: Bob Wing Don Seeberger
Time On Site: 9:00 AM / PM Time Off Site: 11:20 AM / PM
Report Date: 5/11/99 Report By: Bob Stone

Process Information

Processes that Generate Wastes: Waste paint and equipment cleaning.

Waste Streams (description or codes): D001, D006, D008, D018, D035, D039, D040, F001, F003, F005, WP02

Pollution Prevention Suggestions, Technical Assistance Referrals

Information and assistance on the following environmental programs is available from Dennis

Johnson 425-649-7040:

Improved inventory control can prevent waste generated by out-of-date, off-specification, contaminated or unnecessary raw material. Some methods to improve inventory control include:

- Centralized inventory management.
- If materials have a limited shelf life, buy them in smaller containers instead of in bulk.
- Purchase materials in returnable containers or recycle the containers.
- Use Just-In-Time manufacturing to reduce waste from expired and discontinued material.
- Use programs such as the Industrial Materials Exchange (IMEX) to buy and sell surplus materials.
- Return surplus material and product samples to your supplier.
- Make sure your supplier allows return of damaged containers or products.

Conditions Not in Compliance*See Line #, Below*

WAC 173-303-200(1)(b) and by reference -630(7): Containers of liquid dangerous waste did not have adequate secondary containment. 5x55-gallon drums containing liquid hazardous materials or waste were located on the dirt (north of the central accumulation area) without adequate provision for secondary containment. The coating on the containment in the accumulation area (Shed 9) was chipped and cracked.	8 & 19
WAC 173-303-170(1)(a) and by reference -070(3): Generators are responsible for designating their waste as either dangerous waste or extremely hazardous waste. A solid waste was not properly designated prior to disposal or treatment. Procedures were not followed for determining if a solid waste is also a dangerous or extremely hazardous waste. Filters from the paint spray booths were disposed as non-hazardous solid waste. MSDS information provided lists the presence of heavy metals (e.g. zinc, chrome, lead, and cadmium). Test data for hazardous waste characterization on this waste stream was not available.	1
WAC 173-303-200(1)(b) and by reference -630(5)(a): Containers of dangerous waste were left open. Shed 9-Accumulation Area: A 55-gallon drum (1/2 full) of waste MEK had an open bung and funnel. A 55-gallon drum (1/4 full) had open bungs and a hole on the side. Misc. 5-gallon containers of paint waste had open tops. Central Accumulation Area: 3x 55-gallon drums of hazardous waste had open bungs or funnels that sealed to prevent evaporation of the volatile solvents.	6 & 16
WAC 173-303-200(2): Satellite accumulation standards were not met. A container of waste paint thinner in the satellite accumulation area (Shed 6) had an open funnel in the spout and was not labeled "Hazardous or Dangerous Waste".	9
WAC 173-303-200(1)(c): Containers of dangerous waste were not marked with the date accumulation began. 3x55-gallon containers of dangerous waste located in the accumulation area (Shed 9) were not properly labeled with the accumulation start date. 6x55-gallon containers of dangerous waste located in the central accumulation area were not properly labeled with the accumulation start date.	7
WAC 173-303-200(1)(b) and by reference -630(6): Dangerous waste accumulation areas were not inspected weekly and/or weekly inspection logs were not kept. The inspection schedule and log (for the dangerous waste accumulation area) was not adequate to assure compliance with WAC 173-303-200(1)(b) and to identify the violations cited in this report. Current inspection logs for the hazardous waste handling and accumulation area were not available.	6&18

Line No.	Violation	WAC 173-303	Line No.	Violation	WAC 173-303
WASTE MANAGEMENT			ADMINISTRATION/RECORDS		
1	Waste Designation	-170	20	Notification & Identification #s	-060(2)
2	Failure to Offer Waste to TSD	-141	21	Manifesting	-180
3	Spills/Discharges	-145	22	Large Quantity Generator Plans	-200(1)(b), -320 to -360
4	Treatment-by-Generator	-170(3)	23	Recordkeeping Retention Times	-210
5	Accumulation Time Limits	-200(1)(a)	24	Annual Report/Exception Report	-220
6	Accumulation in Containers/Tanks	-200(1)(b), see 630/640	25	Personnel Training Requirements	-330
7	Container/Tank Labeling	200(1)(c)(d)	26	Preparedness & Prevention	-340
8	Secondary Containment	-200(1)(b)	27	Contingency Plan	-350
9	Satellite Accumulation	-200(2)	28	Emergencies	-360
10	Medium Quantity Generator	-201(c)	29	Permit-by-Rule	-802(5)
11	Ignitable/Reactive/ Incompatible Wastes	-395		OTHER DANGEROUS WASTE VIOLATIONS	
12	Used Oil Burned for Energy	-515	30		
13	Use/Mgmt. of Containers	-630	31		
14	- Condition of containers	-630(2)	32		
15	- Compatible containers	-630(4)	33	OTHER ENVIRONMENTAL LAWS/CONCERNS	
16	- Closed containers	-630(5)(a)	34		
17	- Container handling	-630(5)(b)	35		
18	- Weekly Inspections	-630(6)	36		
19	- Secondary Containment	-630(7)	37		

Reminder: Ecology will provide a copy of the text of regulations for which violations are cited.

Questions, Concerns, Comments

Many of the compliance violations and housekeeping problems that were noted in this inspection may have been avoided through employee training in hazardous waste management procedures and general housekeeping practices. Unmarked and unlabeled containers were located in different areas around the facility (e.g. unlabeled 55-gallon drum containing blast grit located outside Shed 6). A system and appropriate employee training to label and identify the contents of all containers will minimize the appearance of unknown waste and unusable inventory.

The containers of liquid dangerous waste locate in the accumulation area near Shed 9 were not managed within the standards for satellite accumulation. This accumulation area was not at or near the point of generation and was not under the control of the operator of the process generating the waste or secured to prevent the improper or unauthorized addition of waste. There was more than 55 gallons per waste stream (waste MEK) in the area. Containers of hazardous wastes were not closed except when adding or removing waste or were not properly labeled identifying the contents as hazardous waste or the risk associated with the waste contents. This accumulation area should be managed under the same conditions and standards as the central accumulation area, including appropriate signage, adequate provision (and integrity) for secondary containment, and be included in the schedule for weekly inspections.

Ecology Form No. 3/15/96

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Site Name: Long Painting WAD 044036747

COMPLIANCE ACTIONS REQUIRED

Instructions: The actions identified below are necessary in order to be in compliance with Washington Dangerous Waste Regulations (Ch. 173-303 WAC), or other environmental laws or regulations. Please indicate the date an action is completed and initial each item. If an action is not completed, please note in the "Date Completed" column and explain on back of this page.

Return Completed Form or Request for Extension -- Upon completion of all actions listed below, please mail a copy of this form to the Washington Department of Ecology at the address listed below. An extension of the deadlines to achieve compliance may be requested. Please make a request in writing, including the reasons an extension is necessary and proposed date(s) for completion, and send it to the Ecology Lead Contact by June 18, 1999. Ecology will provide a written approval or denial of your request.

No.	Action(s) Needed to Achieve Compliance	By When?	Date Completed	Initial
8 & 19	Immediately upon receipt of this report, ensure that all containers of hazardous waste are located within the bermed accumulation area or have provision for adequate secondary containment. Secondary containment should be constructed or lined with material that is chemically resistant to the liquid wastes that are present.	5/18/99	5-14-99	(J)
1	Within 30 days of receipt of this report, designate all undesigned paint spray booth filters generated at the facility per WAC 173-303-070, or submit samples to a qualified testing laboratory for analysis of dangerous waste characteristics and criteria. Provide Ecology documentation that the proper designation of dangerous wastes has occurred. This documentation may include copies of the analytical results of designation testing.	6/18/99	6-17-99	(J)
6 & 16	Immediately upon receipt of this report, close all containers of dangerous waste securely. Transfer all waste in the drum with the hole in the side to a structurally sound container. A container holding dangerous waste must always be closed, except during the actual time when it is necessary to add or remove waste.	5/18/99	5-14-99	(J)
9	Immediately upon receipt of this report, comply with all provisions for satellite accumulation areas to include the container labeling requirements in WAC 173-303-200(1)(d) and the closed container requirements in WAC 173-303-630(5)(a).	5/18/99	5-14-99	(J)
7	Immediately upon receipt of this report, ensure that the accumulation start date is clearly written on all containers holding dangerous wastes and is visible for inspections of the accumulation area.	5/18/99	5-14-99	(J)
6 & 18	Immediately upon receipt of this report, implement inspections utilizing written logs per WAC 173-303-200(1)(b) and 173-303-630 (also reference WAC 173-303-320).	5/18/99	5-14-99	(J)

Ecology Lead Contact: Bob Stone 425-649-7216

Date: 5/14/99

Address: 190 160th Ave SE Bellevue, WA 98008

Received By: _____

This checklist serves as a notice of deficiency for technical assistance visits or a notice of correction for other site visits as provided for in the Washington State Law "Implementing Regulatory Reform", Chapter 403, Laws of 1995.

Follow-up by Ecology: Phone ☐ Letter ☐ Revisit ☐ None ☐
Photos Taken: Yes / No Samples Taken: Yes / No Splits Offered: Yes / No
Documents Left: Regulations ☐ Step by Step ☐ TIMs ☐ Focus Sheets ☐
Additional _____

Assistance/Enforcement Programs Explained: Yes / No

If you have any questions about information in this Checklist, please call the Ecology Lead Contact. The Department of Ecology is an equal opportunity agency. If you have special accommodation needs, contact Felicia Curtis at (360) 407-6721 or Julie Carrasco at (360) 407-6199 (Voice), or (360) 407-6006 (TDD).

Ecology Form No.

3/15/96

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Philip Services Laboratory
955 Powell Avenue S.W.
Renton, WA 98055-2908
TEL 425.227.6110
FAX 425.227.6196

Analytical Report

To: JOHN CARLSON
Long Painting Company
8025 10th Ave South
Seattle WA 98108-4405

Report Date: 06/16/99	Generator: LONG PAINTING	Work Order No.:
Sample Collected: 06/11/99	Project Name: SHOP-FILTER MEDIA	P.O. No.: 181859
Received Date: 06/11/99	Project No: 600	Job Number: 99060091

Client ID: 565

Profile #:

Lab ID: AA57944

Booth 4

Analyte	Method	Result	Units
TCLP Metals			
TCLP (Extraction Procedure)	EPA 1311	100	g
Silver	EPA 6010	< 0.010	mg/L
Arsenic	EPA 6010	1.45	mg/L
Barium	EPA 6010	1.93	mg/L
Cadmium	EPA 6010	0.0533	mg/L
Chromium	EPA 6010	0.338	mg/L
Copper	EPA 6010	< 0.025	mg/L
Nickel	EPA 6010	< 0.040	mg/L
Lead	EPA 6010	0.425	mg/L
Selenium	EPA 6010	4.13	mg/L
Zinc	EPA 6010	723	mg/L
Mercury	EPA 7470	< 0.0004	mg/L

Sample Comments:

Zinc level in sample is greater than five times the spike amount.

Data Reported By:

Andrea Morgan



Philip Services Laboratory
955 Powell Avenue S.W.
Renton, WA 98055-2908
TEL 425.227.6110
FAX 425.227.6196

Analytical Report

To: JOHN CARLSON
Long Painting Company
8025 10th Ave South
Seattle WA 98108-4405

Report Date: 06/16/99
Sample Collected: 06/11/99
Received Date: 06/11/99

Generator: LONG PAINTING
Project Name: SHOP-FILTER MEDIA
Project No: 600

Work Order No.:
P.O. No.: 181859
Job Number: 99060091

Client ID: 564

Profile #:

Lab ID: AA57943

Booth 2

Analyte	Method	Result	Units
METALS			
TCLP Metals			
TCLP (Extraction Procedure)	EPA 1311	100	g
Silver	EPA 6010	< 0.010	mg/L
Arsenic	EPA 6010	1.06	mg/L
Barium	EPA 6010	0.338	mg/L
Cadmium	EPA 6010	0.0415	mg/L
Chromium	EPA 6010	0.0962	mg/L
Copper	EPA 6010	< 0.025	mg/L
Nickel	EPA 6010	< 0.040	mg/L
Lead	EPA 6010	0.342	mg/L
Selenium	EPA 6010	2.92	mg/L
Zinc	EPA 6010	466	mg/L
Mercury	EPA 7470	< 0.0004	mg/L



Philip Services Laboratory
955 Powell Avenue S.W.
Renton, WA 98055-2908
TEL 425.227.6110
FAX 425.227.6196

Analytical Report

To: SYMANTHA DELACRUZ
Long Painting Company
8025 10th Ave South
Seattle WA 98108-4405

Report Date: 05/25/99	Generator: GEORGE THIRDS	Work Order No.:
Sample Collected: 05/19/99	Project Name: GEROGE THIRDS	P.O. No.: 181179
Received Date: 05/20/99	Project No: 804427	Job Number: 99050162

Client ID: 558

Profile #:

Lab ID: AA57232

Boeth 3 & 9

Analyte	Method	Result	Units
METALS			
TCLP Metals			
TCLP (Extraction Procedure)	EPA 1311	100	g
Silver	EPA 6010	< 0.010	mg/L
Arsenic	EPA 6010	3.62	mg/L
Barium	EPA 6010	< 0.200	mg/L
Cadmium	EPA 6010	0.140	mg/L
Chromium	EPA 6010	0.201	mg/L
Copper	EPA 6010	< 0.025	mg/L
Nickel	EPA 6010	0.491	mg/L
Lead	EPA 6010	1.34	mg/L
Selenium	EPA 6010	7.55	mg/L
Zinc	EPA 6010	563	mg/L
Mercury	EPA 7470	< 0.0004	mg/L

Data Reported By: *James Thomas*